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July 2, 2021

**VIA ECF**

The Honorable Denise L. Cote  
Senior United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *United States v. Edward Abreu*  
20 Cr. 52 (DLC)

Dear Judge Cote:

Please recall that I represent Mr. Edward Abreu in the above-referenced matter. Mr. Abreu is presently scheduled to appear before Your Honor for his sentencing hearing on July 16, 2021, at 11:00 a.m., and per Your Honor's Individual Rules, the defense's sentencing submission is due today, July 2, 2021. For the reasons that follow, I write to request that Your Honor grant a 30-day adjournment of the sentencing hearing and adjust the parties' respective sentencing submissions accordingly. I have discussed this request with A.U.S.A. Thomas Wright, and the Government has no objection.

As Your Honor is aware, the parties received the final draft of the United States Probation Presentence Report (PSR) today, July 2, 2021, at which time we immediately scheduled a telephone conference with Mr. Abreu at the Metropolitan Correctional Center for July 6, 2021, at 1:00 p.m. The defense respectfully submits that it requires time to review the final report with Mr. Abreu—especially Probation's sentencing recommendation and justification—prior to finalizing and submitting its sentencing letter.

I apologize to Your Honor for submitting this adjournment request at the last minute. I would have written to Your Honor earlier, but in all candor, I lost track of time, as I am in the process of moving residences and have been and will continue to be living out of a hotel for three weeks. Between being out of my home and training new office support staff post-COVID, I lost track of my responsibilities to the Court on this case.

Therefore, I respectfully request a 30-day adjournment of Mr. Abreu's sentencing hearing and request that the due dates for the parties' respective sentencing submissions be adjusted to

*Sentencing is adjourned to  
July 30 at 11<sup>00</sup> am.  
Defense submissions are due  
July 16; Government's  
submission is due  
July 23. Denise Cote  
7/2/21*